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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL NO. 2843
Case No. 18-md-02843-VC

Hon. Vince Chhabria

***KLEIN PLAINTIFFS' ADMINISTRATIVE
MOTION FOR LEAVE TO FILE UNDER
SEAL***

This Document Relates To: All Actions

1 Pursuant to Civil Local Rules 7-11 and 79-5, plaintiffs in the action *Klein v. Meta Platforms,*
2 *Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.) (“*Klein Plaintiffs*”), hereby submit this Administrative
3 Motion for Leave to File Under Seal (“Motion”) declarations in support of the *Klein Plaintiffs’*
4 Statement of Objection to Release in *Facebook, Inc. Consumer Privacy User Profile Litigation*
5 Settlement Agreement filed simultaneously with this Motion.

6 In support, the *Klein Plaintiffs* state that the Declaration of Maximilian Klein, Declaration of
7 Sarah Grabert, and Declaration of Rachel Banks Kupcho in Support of *Klein Plaintiffs’* Objection to
8 Release in *Facebook, Inc. Consumer Privacy User Profile Litigation* Settlement Agreement contains
9 personally identifiable information relative to each *Klein Plaintiff* Objector, such as home address,
10 email address, and phone number. Personal identifying information is good cause for partially
11 sealing these declarations. *See Snapkeys, Ltd. v. Google LLC*, No. 19-CV-02658-LHK, 2021 WL
12 1951250, at *3 (N.D. Cal. May 14, 2021) (noting that “home address, phone number, and email
13 address” are sealable); *see also Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors*
14 *LLC*, No. 17-CV-03874-LHK, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019) (sealing “names,
15 addresses, phone numbers, and email addresses”).

16 *Klein Plaintiffs* respectfully request that the Court grant their Administrative Motion to File
17 Under Seal pursuant to Civil L.R. 7-11 and seal the aforementioned information from the public
18 record.

DATED: July 26, 2023

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

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ATTESTATION OF SHANA E. SCARLETT

This document is being filed through the Electronic Case Filing (ECF) system by attorney Shana E. Scarlett. By her signature, Ms. Scarlett attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: July 26, 2023

/s/ Shana E. Scarlett
Shana E. Scarlett

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of July, 2023, the foregoing document was served on all attorneys of record by electronic mail.

Dated: July 26, 2023

/s/ Shana E. Scarlett
Shana E. Scarlett